Case 1:23-cr-00275-PGG Document 14 Filed 07/24/23 Page 1 of 1

Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York Jennifer L. Brown Attorney-in-Charge

July 24, 2023

VIA ECF

Honorable Paul G. Gardephe United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>United States v. Jimmy Solano-Arias</u> 23 Cr. 275 (PGG)

Dear Judge Gardephe,

I write to respectfully request that the Court adjourn the status conference currently scheduled for July 27, 2023 to the beginning of September. After our appearance before the Court on June 12 for Mr. Solano's arraignment, the parties negotiated the terms of a protective order that the Court endorsed on July 5. The defense received a 1 terabyte drive with the discovery on approximately July 15. We have begun reviewing the materials, but given the volume and that we have only had them for just over one week, we need additional time to complete that process and make informed decisions about next steps.

The government, by Assistant United States Attorney Lindsey Keenan, has no objection to this application.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Thank you for your consideration.

Respectfully submitted,

/s/ Sylvie Levine Attorney for Mr. Solano 212-417-8729